

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>TENNESSEE CLEAN WATER NETWORK</b>	)	
<b>and TENNESSEE SCENIC RIVERS</b>	)	
<b>ASSOCIATION,</b>	)	No. 3:15-cv-00424
	)	
Plaintiffs,	)	Judge Waverly Crenshaw
	)	
v.	)	Magistrate Judge Holmes
	)	
<b>TENNESSEE VALLEY AUTHORITY,</b>	)	
	)	
Defendant.	)	

**CONSERVATION GROUPS' WITNESS LIST**

Pursuant to the Court's October 20, 2016, Order (Dkt. 142), Tennessee Clean Water Network and Tennessee Scenic Rivers Association submit this list of individuals they may call or will call to testify in the trial of this matter. This list does not include witnesses that will be called or may be called solely for impeachment in accordance with Fed. R. Civ. P. 26(a)(3). Conservation Groups intend to call as live witnesses all but the individual indicated with an asterisk, whom they intend to present by deposition.<sup>1</sup>

Pursuant to Rules 702, 703, 704 and 705 of the Federal Rules of Evidence, Conservation Groups identify the following witnesses who are providing direct written testimony pursuant to Local Rule 39.01 (filed contemporaneously herewith) and who Conservation Groups expect to present at trial, *see* Fed. R. Civ. P. 26(a)(3)(A):

**1. Avner Vengosh, PhD**

Professor of Geochemistry and Water Quality,  
Division of Earth and Ocean Sciences  
Nicholas School of the Environment  
205 Old Chemistry Building; Box 90227  
Duke University

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<sup>1</sup> On December 9, 2016, Conservation Groups filed an unopposed motion to take the trial deposition of Michelle Haynes, which has not yet been ruled upon. (Dkt. 153).

Durham, NC 27708  
Telephones: Office (919) 681-8050; Lab: (919) 681-0638; Fax (919) 684-5833  
E-mail: vengosh@duke.edu

2. **Barry Sulkin**  
Environmental Consultant  
4443 Pecan Valley Road  
Nashville, TN 37218,  
Telephone: (615) 255-2079  
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3. **A. Dennis Lemly, PhD**  
Research Fisheries Biologist  
U.S. Forest Service and  
Research Association Professor of Biology  
Wake Forrest University  
15 Sapona Road, Lexington, NC 27295  
Telephone: (336) 225-4086  
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4. **Chris Groves, PhD, PG**  
Distinguished Professor of Hydrogeology  
Department of Geography and Geology  
Western Kentucky University  
Bowling Green, KY 42101  
Telephone: (270) 745-5974  
E-mail: chris.groves@wku.edu

5. **Mark Quarles**  
Global Environmental, LLC  
P.O. Box 58302  
Nashville, TN 37205  
Telephone: (615) 646-0969

Conservation Groups also expect to call the following fact witnesses and/or witnesses disclosed pursuant to Rules 26(a)(1) and 26(a)(2)(B) of the Federal Rules of Civil Procedure:

6. **Anthony Dolle**<sup>2</sup>  
Member and Board President, Tennessee Clean Water Network  
625 Market St., Knoxville, TN 37902  
Mailing Address: PO BOX 1521, Knoxville, TN 37901  
Telephone: (865) 522-7007

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<sup>2</sup> The address, e-mail and/or telephone number for Conservation Groups' members are provided for the respective organizations.

Fax: (865) 525-4988

7. **Michelle Haynes** (Tennessee Clean Water Network)\*

Member, Tennessee Clean Water Network

625 Market St., Knoxville, TN 37902

Mailing Address: PO BOX 1521, Knoxville, TN 37901

Telephone: (865) 522-7007

Fax: (865) 525-4988

8. **Jessica Becket**

Member, Tennessee Scenic Rivers Association

P.O. Box 159041

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9. **Joe Prochaska**

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10. **Charlie Wilkerson**

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11. **James Woodall**

Member, Tennessee Scenic Rivers Association

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E-mail: ops@paddletsra.org

12. Representatives from the Tennessee Department of Environment and

Conservation involved in permitting and compliance activities at Gallatin Fossil Plant, including:

a. **Vojin Janjić**

Tennessee Department of Environment and Conservation

Division of Water Resources

312 Rosa L. Parks Avenue, 11th Floor

Nashville, Tennessee 37243

Telephone: (615) 532-0625

b. **Britton Dotson**

Tennessee Department of Environment and Conservation

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c. **Chuck Head**  
Senior Advisor  
Tennessee Department of Environment and Conservation  
Division of Water Resources  
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(615) 532-0625

Pursuant to Fed. R. Civ. P. 26(a)(3)(A), Conservation Groups identify the following witnesses it may call if the need arises:

13. **Frank Fiss**  
Tennessee Wildlife Resources Agency  
Ellington Agricultural Center  
Nashville, Tennessee 37204  
Telephone: (615) 781-6598  
Frank.Fiss@tn.gov

14. **Alan Sparkman**  
Tennessee Concrete Association  
705 Fort Negley Court  
Nashville, TN 37203  
asparkman@tnconcrete.org  
Telephone: (615) 975-6696

15. **Dr. Craig E. Philip**  
Vanderbilt Center for Transportation and Operational Resiliency  
Room 277, Jacobs Hall, Vanderbilt University, VU Station B-35 1831  
Nashville, TN 37235-1831  
Telephone: (615)812-0300  
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16. **Jovian Sackett**  
Senior Geospatial Analyst  
Southern Environmental Law Center  
601 W Rosemary St # 220  
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Telephone: (919) 967-1450  
E-mail: jsackett@selcnc.org

17. Any individual appearing on TVA's witness lists.
18. To the extent that TVA refuses to stipulate to the admissibility of a document, Conservation Groups reserve the right to call any officer, employee, or consultant of TVA, the State of Tennessee, or the Southern Environmental Law Center to establish admissibility.
19. Any individuals who may be needed for impeachment or rebuttal purposes.

Respectfully submitted,

s/ Elizabeth A. Alexander

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Witness List was filed electronically on December 23, 2016, through the Court's Electronic Filing System. Parties may access this filing through the Court's electronic filing system. Notice of this filing will be sent by operation of the Court's electronic filing system to the following parties indicated on the electronic filing receipt:

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